

Dear FCC -

Re: request for comments on NPRM regarding applicability of CALEA to packet-mode services;

The NPRM finds that carriers must bear the burden of CALEA development and implementation compliance costs for post- January 1, 1995 equipment and facilities. I argue that, as this NPRM was only released in August 2004, instead the Federal Government should retain responsibility for the burden of CALEA development and implementation compliance costs for all current equipment, as well as all equipment presently scheduled for deployment through July 1, 2005. This will fairly give packet-mode service operators time to plan and schedule CALEA compliant equipment for those purchases not already well within their financial and Information Technology pipeline.

Sincerely,

Jay Libove, CISSP